



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 12, 2021

**BY ECF**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
New York, New York 10007

**Re: United States v. Paul M. Daugerdas, 09 Cr. 581 (DLC)**

Dear Judge Cote:

The Government respectfully submits this letter to jointly propose a schedule in the above-referenced ancillary proceeding concerning Eleanor Daugerdas. After conferring with counsel for Petitioners, the Government understands that Petitioners' counsel will be away for two weeks beginning tomorrow, and as a result respectfully requests the Court permit the parties to conclude discovery on or before November 23, 2021. The parties further request an additional four weeks after the close of discovery – that is, until December 21, 2021 – to file any motions for summary judgment. To the extent a hearing is necessary, the parties would propose the Court schedule any hearing for February 2022.

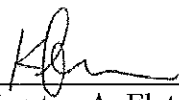
*Granted. Opposite to a  
motion is due 1/21/22.  
Reply is due 2/1/22.*

*Denise Cote  
10/13/21*

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:

  
Kiersten A. Fletcher  
Assistant United States Attorney  
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cc: Counsel (by ECF)